

Alliance for the Wild Rockies

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RECEIVED BY U.S. FISH
AND WILDLIFE SERVICE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE

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Dear Dr. Servheen,

Please accept for consideration our comments on the Draft Environmental Impact Statement (DEIS) for proposed reintroduction of grizzly bears into the Salmon-Selway-Bitterroot region.

I. Introduction

Alliance for the Wild Rockies is a regional conservation organization consisting of more than 4,000 individual members and more than 900 businesses and organizations. We are directly affected by any plan regarding the recovery of the grizzly bear in the Northern Rockies. Many of our members, board members, and advisors have been directly involved in numerous studies of the grizzly bear.

Alliance for the Wild Rockies supports Alternative 4 for grizzly bear recovery in the Greater Salmon-Selway-Bitterroot Ecosystem, with amendments, as discussed below. We desire that the U.S. Fish & Wildlife Service implement Alternative 4 as the action alternative in the form that it was originally submitted to U.S. Fish & Wildlife Service (Alliance for the Wild Rockies Special Report #8, 1996). A full copy of the alternative, as proposed, is attached as Appendix A. There are several issues within the DEIS that we wish to see addressed and corrected.

In general, we are troubled by the vagueness which characterizes the DEIS. There is a lack of specificity on several key issues which indicates that many major decisions on how to carry out the program will presumably be left to the Citizen Management Committee to design and carry out. With a sensitive and rare species such as the grizzly bear, we feel many more specifics need to be addressed well before reintroduction is contemplated. The effort, as described in the preferred alternative, indicates that the citizen committee will make up recovery efforts as they go, which we find unacceptable. Key questions regarding the reintroduction and recovery effort go unanswered in the DEIS. There is also a shallow foundation of factual data upon which the



preferred alternative is based. We believe that the Endangered Species Act (ESA) and National Environmental Policy Act (NEPA) both require a more thorough analysis of the issues associated with proposed reintroduction and recovery of a listed species.

II. Specific Problems With the Preferred Alternative in the DEIS

A. "Experimental, Non-Essential" Designation is Not Legal

The "experimental, non-essential" population designation would not be legal under section 10(j) of the Endangered Species Act (ESA), which specifies that experimental populations must be wholly separate, geographically, from other populations of the same species. According to U.S. Fish and Wildlife Service maps, the Bitterroot area is less than 40 miles from an established grizzly bear population in the Cabinet Mountains (U.S. Fish & Wildlife Service 1993).

Moreover, a list of credible grizzly bear sightings south of the Clark Fork River were provided by the U.S. Fish & Wildlife Service (1997). The list of 17 sightings between 1979-1996, including some in Idaho, puts verified grizzly bear presence even closer to the Bitterroot Recovery Area, particularly as delineated under Alternative 4. There have also been persistent reports of grizzly bears from throughout the proposed recovery region. Many hunters and hunting outfitters have reported sightings of grizzly bears and other reliable sources, including grizzly bear researchers, believe a small population of grizzly bears is likely to inhabit this region.

The DEIS incorrectly cites papers by Melquist (1985) and Groves (1987) as presenting conclusive evidence supportive of the U.S. Fish & Wildlife Service position that there are no grizzly bears in the Bitterroot Recovery Area. Both papers contained sections on conclusions. Both concluded that at least a few grizzlies were likely to be inhabiting the area.

B. The Non-essential Designation is Inconsistent With the Goals of the DEIS and the Grizzly Bear Recovery Plan

The ultimate goal of the Grizzly Bear Recovery Plan is the recovery of the grizzly bear and its removal from the list of threatened and endangered species. The goal of the DEIS is the recovery of the grizzly bear in the Bitterroot Recovery Area as well as recovery in the lower 48 states. The DEIS contains several statements that are at odds with a determination that the population should be classified as non-essential, in both the Proposed Rule and the preferred alternative. The DEIS states in its Purpose and Need for Action section that:

"The addition of the BE to the grizzly bear recovery effort will increase long-term survival probabilities and conservation of grizzly bears within the lower 48 states" (DEIS at 1-5).

It also states:

"the BE offers excellent potential to recover a healthy population of grizzly bears and to boost long-term survival and recovery prospects for this species in the contiguous U.S." (DEIS at 1-4).

At 6-107 the DEIS states:

"Grizzly bear population viability in the lower 48 states would be greatly enhanced and accelerated by reintroduction in the Bitterroot Ecosystem."

The DEIS (at vi) states:

"...recovery of grizzly bears in the BE would facilitate conservation and recovery of the species in the lower 48 states..."

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Since recovery of the grizzly bear within the Bitterroot Recovery Area has been directly linked to the recovery and survival of grizzly bears in the lower 48 states, this population is essential to the long-term survival and recovery of the grizzly bear, a listed species. Thus, the proposed action is essential to the long-term survival and recovery of the grizzly bear in the contiguous U.S. states. Therefore, a "non-essential" designation for this population, as proposed in the preferred alternative, is wholly inconsistent with the Grizzly Bear Recovery Plan, the goals of the DEIS, as well as inappropriate under the Endangered Species Act, including section 10(j) of the Act regarding experimental populations. Section 10(j) requires that the Secretary of the Interior, prior to any release of any population, determine on the basis of the best available information whether or not the population is essential to the continued existence of the species. The DEIS has already concluded that establishment of a substantial Bitterroot grizzly bear population is needed to boost the survival and recovery of grizzly bears in the lower 48. Thus, not only does the "experimental, non-essential" designation fail the "wholly separate geographically" test, it also is an inappropriate use of this designation under the provisions of Section 10(j) of the Endangered Species Act.

While the Purpose and Need section and other sections of the DEIS clearly state that recovery of grizzlies in the Bitterroot region is in the best interests of promoting viability and recovery of the grizzly in the lower 48 states, it provides only a very cursory discussion of population viability and metapopulation structure, the key scientific concepts that are the driving force behind the need for recovery of grizzlies in the Bitterroots. These concepts,

3 | soundly grounded in the scientific literature including Allendorf, et al. (1991), Shaffer (1992) and Metzgar and Bader (1992), suggest that as many as 2,000 or more bears may be required to achieve a genetically diverse, viable population of grizzlies in the lower 48 states. Current estimates place less than 1,000 grizzlies in the lower 48 states. In the light of population viability research, it is clear that every individual grizzly is essential to the continued persistence of the species and certainly every population is essential. The DEIS should have provided more detail on the scientific reasons for recovery. Such a discussion would clearly show the inappropriateness of a non-essential designation.

4 | Another problem with the non-essential designation is that naturally immigrating grizzly bears would arbitrarily lose their threatened status when they cross an invisible threshold established for purely political reasons, in violation of the ESA and its mandate to make decisions based on the best available scientific, not political, information.

5 | Both the DEIS and the proposed rule contain a shallow level of analysis on the potential effects on currently designated "threatened" source populations, even while admitting that 10-15 grizzlies would be removed from either the NCDE or Yellowstone populations over five years. Moreover, it states that for any mortalities that occur during or after reintroduction, such dead bears can be replaced with other bears from the same source areas. It is virtually certain that any proposed development plan that would be proposed within either the NCDE or the Yellowstone that would be determined to cause 10-15 or more grizzly mortalities would receive a jeopardy opinion under the Section 7 consultation process. Why such a cursory analysis of mortalities for source populations for reintroduction would not arrive at a jeopardy opinion can only be ascribed to political influence outside of the ESA process.

C. There is Inadequate Protection Under the Preferred Alternative

6 | Under the "non-essential" designation, activities such as timber sales, roadbuilding plans, and other development would not require consultation with the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act, meaning less habitat protection for bears. Moreover, under a non-essential designation, there can be no designation of critical habitat. Likewise, with "non-essential" status, agencies would be under no obligation under Section 7(a)(2) to avoid actions likely to jeopardize the species. Also eliminated are Section 9 takings provisions of the ESA, waived away from consideration by the proposed rule.

The preferred alternative would rely on Forest Plan management and allow the Citizen Management Committee to adopt changes to management plans and practices. Forest Plans include high volume timber harvest and hundreds of miles of new logging roads. These activities are known to have detrimental

effects on grizzly bear habitat. The extensive roadbuilding and timber sales occurring in the Cove-Mallard area are but one example of such habitat destruction authorized under the Forest Plans which are detrimental to grizzly habitat and recovery objectives. It is noted that road density standards on the Clearwater and Nez Perce National Forests, calculated to meet the needs of other species, and not the more stringent needs of the grizzly, are assumed by the U.S. Fish & Wildlife Service to be adequate to accomodate grizzly recovery (DEIS at 4-8).

The lack of adequate habitat protection and the increase in human access will likely lead to higher mortality risk for introduced bears, compounding the obstacles to success presented by small population demographics. The DEIS (at 2-16) appears to recognize this by stating:

"The key to recovery in the BE would likely be due to effective management including limitation of human-caused mortality..."

The proposed action envisions translocating up to 25 bears over the first five years of the project. A wildly optimistic projection of 100% survival would still result in a non-viable population, perhaps thinly distributed throughout thousands of square miles of rugged wilderness. Threatened species status and habitat protection, particularly of roadless areas, and scientifically derived road density standards would provide additional protection needed for a vulnerable population to successfully expand and ultimately be linked with other populations.

D. The Recovery Zone is Artificially Small Under the Preferred Alternative

7 The proposed recovery zone is far too small to support a healthy bear population. The 5,785 square mile area consisting primarily of the Selway-Bitterroot Wilderness Area and portions of the Frank Church-River of No Return Wilderness limits bears to an unrealistically small area. Adjacent lands north of U.S. Highway 12 and elsewhere in the region have been documented to contain higher quality habitat. The proposed recovery area in the preferred alternative is comprised largely of higher elevation lands which are extremely rugged. Much is above treeline. Excluded from the Fish and Wildlife proposal are millions of additional acres of both designated wilderness and roadless areas on U.S. Forest Service lands. The lower elevation lands outside the designated wilderness areas are generally of higher habitat quality.

An expanded recovery zone would eventually lead to bear distribution much closer to the Greater Yellowstone Ecosystem, as well as the Cabinet and Selkirk populations, greatly increasing the chances of successful genetic interchange between these populations. The recovery zone needs to be expanded to include the entire area currently available for recovery. Research

should then be initiated to satellite map this area in detail as described by Craighead and Craighead (1991) in order to evaluate and identify habitat types, quality, and distribution throughout the expanded recovery area.

The recovery zone under the preferred alternative has been limited for purely political reasons, violating the ESA's provision that recovery efforts be based on the best scientific information.

E. Population Recovery Goal is Arbitrary

8 The population recovery goal presented in the DEIS is arbitrary because it is based upon a recovery area of 5,785 square miles, delineated for purely political reasons, and in direct conflict with vegetation research studies carried out by the U.S. Fish & Wildlife Service which show that some of the best quality habitat is north of the recovery zone outlined in the preferred alternative. The failure to use the best available scientific data is a violation of the ESA. Moreover, the density assumed for this area (one bear/20 square miles) may be overly optimistic, given that much of the recovery area under the preferred alternative is above treeline in rugged, lower productivity lands within the Selway-Bitterroot Wilderness Area.

F. Source Bears

The preferred alternative proposes to use grizzly bears from British Columbia, the Yellowstone, and Northern Continental Divide (NCDE) Grizzly Bear Ecosystems as a source of bears to be used for the reintroduction. Absent a sound biological and legal evaluation of the consequences of removing grizzly bears from these potential source areas, these populations are an inappropriate source for reintroduction into the Bitterroot Recovery Area.

9 Many Canadian conservationists contend that southern B.C. populations are now biologically threatened and that capture and removal of reproductively mature bears from these populations is biologically unsound.

We find it alarming that the DEIS states that bears may be taken from currently threatened populations in the lower 48 states. The characterization of these populations having "surplus bears" (DEIS at 4-6) is unsupported with scientifically sound data. Recent mortality data from the Yellowstone and NCDE populations indicate these populations may be declining rather than expanding. The DEIS (at 3-19) incorrectly states that "some of the removals could be compensatory to other mortalities." However, the DEIS also states that only bears with no history of human conflicts or management actions would be used for reintroduction. Thus, trouble-free bears removed from their natural habitat could not be considered as compensatory mortalities.

There is also political pressure (letter from Gov. Racicot to U.S. Fish & Wildlife Service 10/7/97) to not count any bears taken from these ecosystems for Bitterroot reintroduction against their respective mortality quotas designed to meet recovery objectives. However, this would not only be illegal, it would set back recovery efforts in those areas. A letter from the NCDE subcommittee of the Interagency Grizzly Bear Committee cautioned that taking bears from the NCDE "could lessen the chances of recovery for the grizzly in the NCDE." (NCDE Subcommittee letter 9/8/97).

10 Moreover, it is illegal to arbitrarily downgrade grizzlies currently protected as "threatened" to "non-essential." Section 4(a) of the ESA presents 5 factors to be considered in decisions to list or de-list a species. Creating "experimental, non-essential" populations using bears currently listed as "threatened" is not included in the five factors.

As originally proposed (Alliance for the Wild Rockies 1996) we would like the Scientific Committee as envisioned in Alternative 4 to first undertake an analysis of potential source populations to determine if these populations could sustain removal of reproductive age grizzlies to be used for reintroduction purposes.

G. Linkage Corridors

11 The preferred alternative fails to designate or recover habitat linkage corridors for grizzlies to link the Bitterroot population with other grizzly populations. It fails to do this for purely political reasons. Proponents of the preferred alternative and the government itself (DEIS at page 2-15) has pointed to a legal need under Section 10(j) of the ESA to keep the Bitterroot population isolated from other grizzly populations as a way to maintain the "non-essential" designation. However, this runs contrary to the stated purpose of the proposed action (DEIS at page 1-5). One of the leading threats to grizzly persistence in the lower 48 states is reduced genetic variability due to geographic isolation (Allendorf 1997). Peer reviewed scientific papers describing three separate methodologies/processes have shown conclusively that the Yellowstone grizzly population has only about half the genetic variability of grizzlies in the NCDE (Allendorf 1997).

12 The DEIS also failed to provide an indepth analysis of the prospects of natural recolonization to the Bitterroot Recovery Area facilitated by restoration of a habitat linkage corridor, even though one of the Alternatives (4) contains such a corridor, Alternative 2 is a natural recovery alternative, and public scoping identified corridors as a major issue that a large number of the public wanted addressed in the DEIS.

Using the formula from the DEIS (at 2-22), it might take 12 years or less for grizzlies to migrate from the Cabinet-Yaak Grizzly Bear Ecosystem to the

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Bitterroot Ecosystem, since under Alternative 4 the recovery areas are less than 40 miles apart. Data from the U.S. Fish & Wildlife Service (1997) show that there is a history of documented grizzly bear presence and use of this linkage area. The DEIS failed totally to analyze the benefits of road obliteration and recovery of habitat security within this proposed linkage zone. A thorough analysis, including modelling of such habitat improvements, may well have shown that natural recovery might occur as soon or sooner than physical reintroductions of bears might encourage.

H. Population Growth Curves are Unrealistic

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The DEIS provides scant documentation regarding the time expected to reach population recovery goals. It shows a simplistic graph based upon numbers derived from other ecosystems. We take issue with the growth supposedly documented in other areas. For example, the DEIS claims that an 8% population growth rate has been documented for the North Fork of the Flathead drainage in southeast British Columbia and then in the graph describes an 8% growth curve for the entire NCDE population. There is no scientific data to support an 8% annual growth rate for the NCDE population. To assume such growth rates is wholly inappropriate, particularly considering a small founding population introduced with minimal protections for the species and its habitat. An analysis of the DEIS (Montana Chapter, Society for Conservation Biology 1997) shows that such predictions are unreliable. The DEIS should have provided a more realistic range of potential outcomes, including zero or negative population growth rates, based upon different levels of mortalities to both females and males as well as possible immigration or emigration from the area. These scenarios can be modelled and should have been included in the DEIS analysis.

I. Citizen Management Committee

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Under current law, there is no provision for a Citizen Management Committee to carry out recovery efforts pursuant to the ESA. Section 10(j) contains no provisions whatever which authorize delegating ESA responsibilities to a citizen committee. The U.S. Fish & Wildlife Service has embraced a liberal interpretation of Section 10(j) special rules to mean that they can make up anything they want. All rules must be consistent with the governing law, in this case the ESA. The special rule also mandates that the citizen committee must minimize social and economic impacts, which is not a part of ESA planning. This mandate will easily be construed to mean that the citizen management committee must not allow any reductions in timber harvesting or roadbuilding in order to aid recovery of grizzly bears. This is a clear violation of the ESA.

Thus, the preferred alternative is not a legal alternative. To adopt the preferred alternative as the action alternative will require amendments to the

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ESA. As such, the preferred alternative is a cart before the horse proposition in that the Fish & Wildlife Service wishes to adopt a plan based upon changes to the ESA that have not been made or approved by Congress. Moreover, the DEIS has not articulated a rational reasoning for selecting this approach, as required by the National Environmental Policy Act. Thus, again the preferred alternative is not a legal alternative and should not have been put forth as a preferred alternative. NEPA requires a range of alternatives within EISs, but such alternatives must be legal under existing, not proposed, laws. As such, Alternative 3 should also not have been presented within the DEIS. For the Secretary of the Interior to abdicate his authority for implementation and enforcement of the ESA, Congress will have to amend the ESA to allow it.

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Also, as embodied within the preferred alternative, the Citizen Management Committee appears to be open to manipulation and a stacked deck approach. The governor of Idaho, an ardent opponent of grizzly recovery, would be allowed to appoint seven members to the committee. The governor of Montana, who has publicly called for removing the legal protections for the grizzly, would appoint five members. This raises the distinct prospect that at least 12 of the 15 committee members could harbor anti-grizzly attitudes which could thwart recovery. There is no requirement that the appointees to the committee have any expertise in grizzly bear biology and management, or wildlife management in general so that even if well-intentioned, the committee could lack the required knowledge to successfully implement a recovery program.

The Citizen Management Committee approach, contrary to its stated aims, actually will increase bureaucracy and add new layers of decision making. It also creates delay mechanisms in addressing serious concerns. For example, if the committee is taking actions that are believed to run contrary to recovery, the Secretary of the Interior writes them a letter stating his concerns and gives the committee six months to correct the problems. Six months is a long time to allow problems to continue before invoking his authority.

Moreover, the citizen management approach appears to be a thinly veiled attempt at land control, based upon failed attempts to enact release language for roadless areas through congressional wilderness legislation. We note that under the preferred alternative that the actual recovery area for the grizzly is limited to 5,785 square miles while the authority for land management decisions given to the citizen management committee extends to 25,140 square miles with a mandate lasting between 50-110 years, or whenever they declare "recovery." Granting management authority to most of Idaho will require congressional legislation, not a simple federal register rule change.

The citizen management concept, while good for press consumption, is undemocratic, illegal, unwieldy, and designed to perpetuate land uses such as

timber, minerals, and forage extraction. It is a model based upon attempts to privatize federal public lands belonging to all American citizens, and held in the public trust. This idea should be rejected. If the government would like to have input from local citizens, it can form a citizens advisory panel, while retaining authority and responsibility for ESA implementation. Advisory panels which are not controlling, are legal. Management by political appointees is illegal.

J. Economic Analysis is Biased Towards Timber Production

17 The economic analysis of alternatives in the DEIS is skewed in favor of timber production jobs. In regards to the analysis of Alternative 4, the DEIS incorrectly assigns jobs associated with habitat restoration (road removal, etc.) as temporary jobs while claiming that timber production jobs are permanent jobs. There is ample economic data that show that timber jobs are temporary jobs and are declining as a percentage of total employment throughout the region. One person can cut in an hour what two people could cut in a day ten years ago (Garritty 1996). Automation continues to cause reductions in the timber production workforce.

Several major economic studies have documented that the economic base of the region has shifted away from resource extraction industries and is based upon quality of life values (Power 1996). A report from 39 economists (Power et al. 1995) shows that the wildlands, clean water, and fish and wildlife populations of the region attract and hold new workers and benefit the regional economy. Moreover, willingness-to-pay models are an inaccurate method of determining the economic value of grizzly bears.

K. Measurements of Progress

18 The DEIS fails to outline specific measurements to be used to gauge the success of the program. It simply assumes that moving a total of 25 bears into the area over a five year period will automatically lead to steady population growth until recovery objectives are achieved. This may not be the case and there is a need for specific measurements designed for both short term and long term monitoring to accurately determine trends in population numbers, mortalities, habitat conditions and security, and other indicators.

III. The Benefits of Selecting Alternative 4 as the Implementation Alternative

A. Alternative 4 Complies With the Endangered Species Act

19 Alternative 4 is the only alternative included in the DEIS that complies with the ESA. Alternative 1 is illegal for the reasons stated above. Alternative 2, No Action, is also illegal since the U.S. Fish & Wildlife Service is mandated under the ESA to undertake actions to actively promote the recovery of the

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the grizzly bear and the DEIS states recovery of a Bitterroot subpopulation would boost the chances of survival and recovery of the species in the contiguous 48 states. Alternative 3 is illegal because this isn't allowed under current laws. Only Alternative 4 fully complies with the ESA. It requires no amendments to the ESA since it would maintain threatened status for grizzlies and management authority would remain with the Secretary of the Interior. It also is based upon the best available scientific information, as required by the ESA.

B. Scientific Process

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The Scientific Committee concept, as embodied in Alternative 4, is the most appropriate way to manage and monitor the recovery effort. We wish the DEIS to be amended to add back in the descriptive language for the duties of the Scientific Committee, and member qualifications, as originally submitted to the U.S. Fish & Wildlife Service (Alliance for the Wild Rockies 1996, Section X., pages 12-14 [attached in Appendix A]).

C. Habitat Protection

Alternative 4 is based upon sound scientific principles and research results which indicate that protection of roadless areas is a critical element in grizzly bear recovery efforts. Its strong protection for roadless areas and its process for establishing scientifically-derived road density standards and other habitat protection standards is consistent with the ESA mandate to use the best available scientific information in establishing methods for achieving recovery.

D. Habitat Restoration and Job Creation

Through its active plan to reduce road densities and obliterate roads within the Corridor Special Management Area, Alternative 4 will not only improve the chances for natural immigration to the Bitterroot Recovery Area and occupation by resident grizzly bears, it will also benefit other species such as bull trout, elk, and other sensitive species. According to Garrity (1996), these efforts will also create 1,501 high-paying jobs. Thus, local citizens can be directly invested in grizzly recovery efforts.

E. Measurements of Progress

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The measurements of progress submitted in the original proposal (Alliance for the Wild Rockies 1996:14) should be amended into Alternative 4. These provide a sound basis for judging the progress of the recovery effort and provide vital information needed for any course adjustments.

F. Consistent With Regional Economic Trends

Alternative 4 is consistent with regional economic trends by providing a strong base of ecosystem protection and job creation. Garrity (1996) documented that this plan will create 1,501 high-paying jobs and provide a net benefit to the U.S. Treasury of approximately \$69 million dollars. The DEIS noted that Alternative 4 is probably the best economic alternative over the long term. Forty western economists have endorsed Alternative 4. The DEIS (at 4-55) concluded that any economic loss resulting from road restrictions under Alternative 4:

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"...would likely be more than offset by improvements in recreational opportunities for hunters and fishermen from habitat improvements and reduced sedimentation rates in roaded areas."

The DEIS (at 4-53) states:

"Road reclamation would likely benefit big game populations, most notably elk, and fish populations are likely to benefit from reduced sedimentation which impacts spawning habitat."

G. Public Support for Alternative 4

A tally of testimony at 7 hearings held by the U.S. Fish & Wildlife Service in Idaho and Montana show that more people testified in support of Alternative 4 than any other alternative. Alternative 1 was supported by only 11% of those who testified, while 40% supported Alternative 4. This plan is also supported by hundreds of organizations, businesses, unions, local governments, scientists, and economists including the Missoula County Commissioners, the Confederated Salish & Kootenai Tribes, U.S. Rep. Christopher Shays, U.S. Rep. Carolyn Maloney, the Associated Students of the University Of Montana, the Montana Chapter of the Society for Conservation Biology, the Idaho Audubon Council, the Sierra Club, and numerous others. A full list of endorsers of Alternative 4 is provided attached as Appendix B.

H. Source Bears

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We insist that Alternative 4 be amended to preclude any possibility of removing grizzly bears from "threatened" populations in the NCDE or Yellowstone areas for reintroduction purposes. We likewise wish Alternative 4 to be amended to reinsert the language originally submitted calling for the Scientific Committee to undertake a thorough analysis of potential source populations prior to any consideration of removing grizzly bears from these ecosystems for reintroduction purposes.

IV. Summary

We believe, if done properly, we can increase the likelihood of success of establishing a metapopulation of grizzly bears in the Greater Salmon-Selway Ecosystem, which in turn can be an essential element of grizzly survival and recovery in the contiguous 48 states, without compromising protection for the grizzly bears and their habitat, and with investing the local public directly in grizzly recovery efforts. If linked with corridors to other subpopulations, and done in concert with active wildland recovery efforts, the chances of immigration from other populations is increased, as is the likelihood of genetic interchange among subpopulations. Over the longterm, we believe this is the most biologically sound approach to reestablishment of grizzlies in the Greater Salmon-Selway region. A system of protected core areas and linkage corridors is likely the best hope of providing a landscape capable of supporting a viable metapopulation of grizzly bears in the Northern Rockies.

We strongly encourage the U.S. Fish & Wildlife Service to adopt Alternative 4, with the amendments outlined above, as the action alternative in the final EIS and Record of Decision. We are strongly opposed to the preferred Alternative 1, and ask that it be withdrawn from consideration and the Proposed Rule associated with the preferred alternative in the Federal Register be withdrawn as well.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Bader", with a stylized, flowing script.

Mike Bader
executive director